

**JENKINS & CLAYMAN**

JEFFREY E. JENKINS \*✧  
ERIC J CLAYMAN ◊

ATTORNEYS AT LAW  
412 WHITE HORSE PIKE

BRANCH OFFICES  
(BY APPOINTMENT ONLY)

STEPHANIE F. RITIGSTEIN ✧  
RHONDI LYNN SCHWARTZ ◊

AUDUBON, N.J. 08106  
(856) 546-9696

1675 ROUTE 533, SUITE 102  
TRENTON/HAMILTON, N.J. 08619

FAX (856) 546-7013

1125 ATLANTIC AVE., SUITE 536  
ATLANTIC CITY, N.J. 08401

EMAIL: jenkins.clayman@verizon.net

120 N. EIGHTH STREET  
VINELAND, N.J. 08360

645 HIGHWAY 18, SUITE 117 B  
EAST BRUNSWICK, N.J. 08616

\* BOARD CERTIFIED-CONSUMER  
BANKRUPTCY LAW-AMERICAN BOARD OF  
CERTIFICATION APPROVED BY THE  
AMERICAN BAR ASSOCIATION  
✧ ADMITTED TO PA & NJ BARS  
◊ ADMITTED TO NJ BAR

May 5, 2020

Honorable Jerrold N. Poslusny, Jr., U.S.B.J.

United States Bankruptcy Court

PO Box 2067

Camden, NJ 08101

Via electronic mail to: ([chambers\\_of\\_jnp@njb.uscourts.gov](mailto:chambers_of_jnp@njb.uscourts.gov)) only

Re: Sandra J. May

Chapter 13 Case No.: 19-27812

Confirmation hearing scheduled for May 6, 2020

Motion for relief from the stay scheduled for May 19, 2020

Dear Judge Poslusny,

Kindly accept this letter as a status report and request for adjournment of the confirmation hearing scheduled for May 6, 2020.

We understand that secured creditor McCormick 105, LLC has filed opposition to the confirmation and seeks dismissal. This creditor has also filed a motion for relief from stay, scheduled for May 19, 2020.

For confirmation, there is a wage order in favor of the Trustee, and we believe that the debtor is materially current with Trustee payments. We believe we have addressed all of the issues on the Trustee's tentative disposition list, however, do concede that the debtor has been unable to provide the State of New Jersey Division of Taxation with a copy of her 2017 tax return. She has consulted with her accountant who is presently not seeing clients in person, and the two of them are attempting to prepare this return, and she would like to have some time to have the return prepared. Please note that all other tax returns have been prepared and filed, and there was an oversight either by Ms. May and her accountant or the State of New Jersey with regards to this 2017 return.

As far as McCormick 105, LLC, Ms. May is in the process of modifying her plan to call for the surrender of the Philadelphia property to all lienholders including McCormick 105, LLC. This is why we seek a postponement to confirmation.

Ms. May will continue to market the property but does realize that she would need to sell the property before there is a sheriff's sale. She understands that there is an assignment of rents and as a result has amended schedules I and J of her bankruptcy petition to delete references to income from the Philadelphia property and expenses relating to the Philadelphia property.

Ordinarily, I would be optimistic that a modified plan which calls for the surrender of collateral would address the secured creditor's objection to confirmation. However, I note that the motion for relief from the stay seeks relief as to both the Philadelphia property and another property located in Lower Township, Cape May County, New Jersey. Neither the debtor nor our office is familiar with this property and as such, Ms. May cannot consent to the entry of the form of order submitted.

Thank you for giving this matter your kind attention.

Respectfully yours,

*/s/ Eric J Clayman*

Eric J Clayman

EJC/aa

Cc: Isabel C. Balboa  
Sandra J. May (by email only)  
Kyle Eingorn, Esquire (by email only)  
muhlmann@martonelaw.com